

EXHIBIT C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

| | |
|---|---------------------------------------|
| In re Terrorist Attacks on September 11, 2001 | 03-md-1570 (GBD)(SN) ECF Case |
| This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i> | 15-cv-9903 (GBD) (SN) ECF Case |

DECLARATION OF ROBERT RAMOS

I, Robert Ramos, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based upon my personal knowledge unless otherwise indicated.

2. At the time of these attacks, I was a citizen of the Dominican Republic. I later became a United States citizen in 2005. Attached as Exhibit A to this Declaration is a true and correct copy of my current proof of U.S. citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center (“WTC”) Towers occurred. At the time of these horrific attacks, I worked as a painter for DeFila Painting in the New York City Area. Attached as Exhibit B to this Declaration is a true and correct copy of my proof of my presence working near the WTC Towers at the time of these horrific attacks.

4. On the morning of September 11th, I had been painting on the fourth floor of the interior of a building at 88 Greenwich Street (next door to the WTC) when I witnessed the second passenger jet, United Airlines Flight 175, collide with the South Tower. I had been so close to the South Tower at the time of the collision that the impact knocked me off of my feet. When I was

able to stand up I saw what looked like a warzone in front of me. I saw a large fire ball rise out of the South Tower, and then human bodies began to fall from the building right before my eyes. The terror and chaos were completely hypnotizing.

5. Paralyzed with fear, my coworkers and I stood in awe of the carnage until I saw the South Tower begin to collapse. I began to run in an attempt to get away from the dust cloud and falling debris. I ran into the Battery Tunnel for cover from the dust and debris, but I soon discovered that I was trapped in an enclosed area that was quickly filling with smoke, dust, and debris.

6. Due to the large quantities of dust and debris that I had inhaled into my lungs and airways, I struggled to breathe and I felt as though I was about to suffocate. In an effort to escape from the debris cloud, I moved towards the Brooklyn end of the tunnel but I collapsed to the ground once I had escaped.

7. An ambulance crew found me and transported me to Long Island College Hospital, where I received initial treatment for my respiratory injuries at approximately 10:30 AM on September 11, 2001. I received oxygen to help me to breathe, and the hospital staff continued to monitor my breathing for several hours.

8. Following my release from the hospital, I continued to experience shortness of breath and associated symptoms for the remainder of 2001. I became excessively fatigued doing simple physical tasks, such as walking up stairs.

9. In the days, weeks, months, and years after the events of September 11th, I continued to seek medical treatment for my various injuries and conditions caused by the 9/11 Attacks. Attached as Exhibit C to this Declaration is a true and correct copy of my select relevant documents

and medical records¹ related to the treatment that I received following the September 11, 2001 terrorist attacks.

10. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001 due to the large quantities of dust and debris that I inhaled following the collapse of the South Tower: asthma², chronic rhinosinusitis³, reactive airway disease syndrome (RADS)⁴, upper airway hyperreactivity⁵, and gastroesophageal reflux disease (GERD)⁶.

11. Due to my experience on 9/11 and my memories of that fateful day, I also have received continuous treatment for depression and post-traumatic stress disorder⁷ (PTSD).

12. My physical and emotional injuries from 9/11 have also been confirmed by the September 11th Victim Compensation Fund (VCF)⁸.

13. An independent medical examination conducted for the New York Workers' Compensation Board by Carl L. Friedman, M.D. also diagnosed me with acute sinusitis, and acute reactive disease syndrome. Dr. Friedman found a causal relationship between my injuries and the September 11th Attacks.⁹

14. I previously pursued claims (VCF Numbers 212-000572 and 0013778) through the September 11th VCF I and VCF II specifically related to my physical injuries incurred on September 11, 2001, and my claims were determined to be eligible for compensation.

¹ See, 9/11 Injury Records of Robert Ramos (RAMOS_MEDS_0001), attached hereto as Exhibit C. at 0001-0050.

² *Id.* at 0013, 0019, 0028, 0029, 0040-0042.

³ *Id.* at 0001, 0013-0014, 0016, 0019, 0028, 0029, 0040-0042.

⁴ *Id.* at 0001, 0016, 0035, 0038.

⁵ *Id.* at 0001, 0016, 0019, 0028-0029, 0035, 0040-0042, 0044-0049.

⁶ *Id.* at 0001, 0014, 0041-0042.

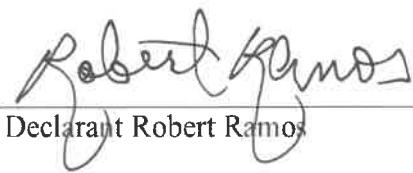
⁷ *Id.* at 0010-0012, 0019-0027, 0030-0040, 0043-0050.

⁸ *Id.* at 0001-0002.

⁹ *Id.* at 0014-0018.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 14 day of MAY 2024.



Declarant Robert Ramos

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**